

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

Jane Doe,

Plaintiff,

v.

NBCUniversal Media, LLC; Apple Inc.; and John Does 1–60,

Defendants.

Case No.: 1:25-cv-05690-JPO

**MOTION TO FILE UNDER SEAL**

Plaintiff Jane Doe respectfully moves this Court to accept the attached Ex Parte Emergency Motion and supporting Declaration under seal pursuant to Fed. R. Civ. P. 5.2(d) and Local Rule 79.3. Public docketing would risk disclosure of sensitive technical evidence and investigative details, compromising Plaintiff's safety and the integrity of ongoing forensic collection.

**PLAINTIFF'S EX PARTE EMERGENCY MOTION**

**FOR APPOINTMENT OF FEDERAL FORENSIC EXAMINER AND IMMEDIATE  
PRESERVATION ORDER**

TO THE HONORABLE COURT:

Plaintiff Jane Doe, proceeding under a pseudonym pursuant to prior order, moves this Court ex parte under Federal Rules of Civil Procedure 26, 34, and 65(b) for an emergency order appointing a neutral, federal court–authorized forensic examiner and securing critical evidence central to this litigation.

## **I. RELIEF REQUESTED**

Plaintiff seeks an immediate order:

1. Appointing a neutral, federal court–authorized forensic examiner to take custody of fifteen (15) electronic devices, including personal and work-issued hardware, as identified in Plaintiff’s sealed evidentiary appendix;
2. Directing the U.S. Marshals Service or other designated federal officer to oversee secure collection and transport of said devices under seal to maintain an unbroken chain of custody;
3. Entering a protective order prohibiting any remote access, wiping, or interference with the devices pending forensic imaging;
4. Authorizing immediate preservation subpoenas to Apple Inc. and other identified cloud/ service providers to secure all associated logs, backups, and metadata linked to the devices, including iCloud and network telemetry;
5. Establishing a schedule for sealed submission of forensic findings to the Court and counsel.

## **II. GROUNDS FOR EX PARTE RELIEF**

This relief is necessary to prevent imminent and irreparable prejudice to Plaintiff’s ability to prosecute her claims. Plaintiff has documented active tampering, unauthorized remote access, and indicators of government-grade surveillance tools operating on multiple devices. These devices contain the primary evidentiary record underpinning Plaintiff’s federal claims, including those under the Computer Fraud and Abuse Act, constitutional privacy violations, retaliation, and Child Endangerment.

Providing notice would create a substantial risk of evidence destruction or manipulation before neutral collection can occur. Plaintiff therefore seeks this order ex parte, consistent with Fed. R. Civ. P. 65(b) standards for emergency relief without notice.

### III. FACTUAL BACKGROUND

- Plaintiff has preserved fifteen (15) devices, including iPhones, Android devices, and work-issued MacBooks, all exhibiting evidence of unauthorized digital intrusion.
- All but one live-use device are currently secured in Faraday containment to prevent further remote access.
- System logs, DNS records, and security traces indicate active wiping attempts and interference as recently as July 30, 2025.
- These devices are central to pending federal claims and continuous harm.
- Plaintiff has submitted a sealed Declaration detailing the devices, current chain-of-custody measures, and specific evidence of tampering.

### IV. CONCLUSION

For these reasons, Plaintiff respectfully requests that the Court grant this Ex Parte Emergency Motion, enter the attached proposed order appointing a neutral federal forensic examiner, direct secure collection under seal, and issue immediate preservation orders.

Respectfully submitted,

/s/ Jane Doe

Jane Doe

Plaintiff pro se

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July 30, 2025